

EXHIBIT G

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re	:	Chapter 11
	:	Case No. 08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	
	:	Jointly Administered
Debtors.	:	
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**OBJECTIONS OF DEBTORS TO NOTICE OF DEPOSITION OF
OCH-ZIFF CAPITAL MANAGEMENT GROUP LLC**

Lehman Brothers Holdings, Inc., and its affiliated debtors in the above-referenced chapter 11 cases (collectively, the "Debtors"), by their undersigned attorneys, hereby object to Och-Ziff Capital Management Group LLC's ("Och-Ziff") Notice of Deposition to Debtors, dated June 2, 2010 (the "Notice of Deposition"), on the following grounds:

1. The Debtors object to the Notice of Deposition on the ground that it is interposed solely for the purposes of harassment. Och-Ziff seeks to take discovery by examining a witness for the Debtors while simultaneously filing its *Memorandum of Law in Support of its Objections to Debtors' Subpoena Duces Tecum Dated April 10, 2010* (the "Motion to Quash"), in which

Och-Ziff disputes the Debtors' legitimate right to obtain discovery from Och-Ziff pursuant to Federal Rule of Bankruptcy Procedure 2004 ("Rule 2004"). Och-Ziff is using the ruse of contesting the Debtors' court-authorized Rule 2004 discovery as a device to seek its own discovery without authorization (or cause) to do so under Rule 2004 or in connection with any pending adversary proceeding. Such cynical sword and shield tactics are improper.

2. The Notice of Deposition seeks to require Debtors to produce a 30(b)(6) witness to testify as to the basis of the Debtors' April 12, 2010 Subpoena for Rule 2004 Examination, which is beyond the scope of any discovery that has been ordered or is presently permitted in these Cases.

3. There is no legitimate basis for Och-Ziff to conduct discovery with respect to the basis upon which the Debtors have sought Rule 2004 discovery of Och-Ziff. The Debtors have met and conferred with counsel for Och-Ziff numerous times during which they explained their basis for seeking such exploratory discovery. Furthermore, the Debtors will file their response to the Motion to Quash, wherein Debtors will explain (again) their basis for seeking Rule 2004 discovery of Och-Ziff. No factual discovery of the Debtors is required.

4. To the extent the Notice of Deposition seeks information concerning Kasowitz, Benson, Torres & Friedman, LLP's representation of the Debtors it requires the Debtors to provide testimony that is protected from discovery by the attorney-client privilege and the attorney work-product doctrine.

5. The Notice of Deposition is premature. Should Debtors commence an adversary or other proceeding against Och-Ziff, Och-Ziff will have a full opportunity to conduct its own discovery of Debtors, as provided for by the applicable rules and procedures. Och-Ziff is not

entitled to discovery of the Debtors with respect to the basis of claims that have not yet been asserted by the Debtors and conceivably may not be.

6. Because the Debtors object to the Notice of Deposition in its entirety, the Debtors have not set forth specific objections and reserve the right to do so in the event their objections should be overruled. The Debtors reserve the right to supplement or amend their objections to the Notice of Deposition consistent with applicable procedural rules.

Dated: New York, New York
June 10, 2010

KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP

By: 

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